

**REMARKS**

**I. Formal Matters**

Claims 1, 2, 4 and 9-24 are all the claims pending in the present Application. Claims 3 and 5-8 were previously canceled.

By this Amendment, Applicants hereby amend claims 10, 14, 15 and 20 for clarity and precision of language. Applicants also add new claims 21-24 to further define the scope of the present invention. Support for the newly added claims can be found throughout the specification.

With respect to the arguments provided with respect to claims 10 and 14, during the Interview of March 21, 2008, the Examiner agreed that although the above arguments were presented in the previous Amendment, these arguments were not addressed in the Office Action of January 30, 2008. MPEP § 707.07(f) states that “[w]here the requirements are traversed, or suspension thereof requested, the examiner should make proper reference thereto in his or her action on the amendment. Where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant’s argument and answer the substance of it.” As such, Applicants respectfully assert that, if a new Office Action is forthcoming, that Office Action should be Non-Final.

**II. Statement of Substance of the Interview**

Applicants thank the Examiner for the courteous telephonic Interview of March 21, 2008. An Examiner’s Interview Summary Record (PTO-413) was not provided to the Applicants. Nevertheless, Applicants hereby provide a Statement of Substance of the Interview. The Statement of Substance of the Interview is as follows:

Applicant's representative met with the Examiner regarding the Office Action of January 22, 2008. During the Interview, the discussion focused on the rejection of claims 1, 10, 14, 15, 16 and 18.

Specifically, with respect to claim 1, Applicant's representative indicated that the Examiner's interpretation of Takeyama is inconsistent with respect to claims 1 and 14. That is, the Examiner asserts that the claimed "slope" corresponds to "inclination surface 18" of Takeyama. However, the Examiner relies on the "upwardly directed hook 21 of the latch arm 20" as the alleged "edge of the slope." With respect to claim 1, during the Interview, the Examiner stated that the "latch arm 20" is a part of the "slope 18 because they are interconnected within the body." However, with respect to claim 14, the Examiner alleged that the "latch arm 20" corresponds to the claimed "stopper part," which is a separate element from the slope part in claim 14. Applicants' representative noted that this is improper, because the reference must be interpreted consistently.

With respect to claim 10, the Examiner took the broad position that the "internal housing, which covers said card" could be interpreted to mean the entire housing, and was not limited to the portion of the housing that covers the card. As such, the Examiner alleged that the engagement elements 11 can be interpreted as the claimed protrusions. Applicant's representative disagreed with this position.

With respect to claim 15, Applicants' representative noted that claim 15 depends from independent claim 1. Independent claim 1 recites that "one end of the slope has an edge for abutting the card in a predetermined position and the other end is integral with the internal housing." Claim 15 further defines "the integrally formed end of the slope [being] integral with

the internal housing **at an area defined by the card insertion port.** With respect to Takeyama, this reference shows the opposite structure. That is, the upwardly directed hook 21 (the alleged card abutting end of Takeyama) is located at the insertion point of the card, while allegedly integral end of Takeyama extends into the housing. As such, Takeyama cannot teach the combination of elements recited in claim 15.

With respect to claim 16, the Examiner agreed that Takeyama fails to disclose, or even suggest the limitations recited in this claim. As such, the Examiner indicated that claim 16 overcomes the cited art of record.

With respect to claim 18, the Examiner indicated that he believed it would “be a stretch” to cover the subject matter of claim 18 with the disclosure of Takeyama. However, the Examiner did not indicate **how** Takeyama could be interpreted to cover this claim. As such, the Examiner invited the Applicants to present arguments directed to this claim on the record.

### **III. Claim Rejections Under 35 U.S.C. § 102**

The Examiner has rejected claims 1, 2, 4 and 9-20 under 35 U.S.C. § 102(a) as allegedly being anticipated by Takeyama et al. (U.S. Patent No. 6,343,018). Applicants respectfully disagree.

With respect to claim 1, Applicants respectfully assert that Takeyama fails to disclose, or even suggest, at least a “card insertion port comprising **a slope to guide the insertion of a card into said internal housing,** wherein **one end of the slope has an edge for abutting the card** in a predetermined position and the other end is integral with the internal housing;

Instead, Takeyama describes an inclination surface 18 for guiding the card into the card holding portion. The Examiner has agreed that the inclination surface 18 does not contain the

above-recited claim elements. However, the Examiner asserts that the latch arm 20 and the upwardly directed hook 21 are a part of the inclination surface 18 “because they are interconnected in the housing.” This is incorrect as the latch arm 20 is a separate element from the inclination surface 18. This is shown in at least FIGS. 2 and 6. In addition, with respect to claim 14, the Examiner agrees with this interpretation and argues that the latch arm 20 is not part of the slope 18, but in fact corresponds to the stopper part 14.

Furthermore, the slope is defined in claim 1 as “guid[ing] the insertion of a card into said internal housing.” As such, the latch arm 20 cannot be a part of the slope 18, because the “latch arm 20” must be depressed before the card can fit into the insertion space, and thus cannot “guide the insertion of a card into said internal housing,” as recited in claim 1. Specifically, Takeyama teaches that “the IC card 5 is, as shown in FIGS. 6 to 8, inserted into the space 6 while pressing down the upwardly directed hook 21 of the latch arm 20.” (See Col. 5, ll. 43-45). For at least these reasons, Applicants respectfully assert that claim 1 is allowable over the cited art of record.

With respect to claims 2, 4, 9-13 and 15-20, these claims depend from independent claim 1. As such, these claims are allowable at least by virtue of their dependency from claim 1. They are also allowable because of the additional limitations recited therein.

For example, with respect to claim 10, Takeyama fails to disclose, or even suggest, the “internal housing compris[ing] a card covering portion and wherein the card covering portion is provided with at least one protrusion extending in a direction toward the card connector and retaining said card in said predetermined position.”

In support of his position, the Examiner asserts that the claimed protrusions correspond to engagement elements (11) “formed as part of top cover plate (15).” This is simply incorrect.

In fact, Takeyama teaches using either the engagement elements 11 or the top plate 15. (See Col. 3, ll. 46-53 “On the other hand, in FIGS 1 to 5, a top plate [1]5 is provided, instead of the engagement elements 11 ...”). In other words, the engagement elements 11 are not formed “as part of the top cover plate 15” as the Examiner asserts, but instead formed as an alternative to the top cover plate.

Similarly, with respect to claim 11, Takeyama fails to disclose, or even suggest “the at least one protrusion [being] located substantially over the card connector.”

Instead, it is clearly shown in FIGS 2 and 6 that no portion of the engagement elements 11 covers the contacts 7 (the alleged card connector). As such, the Examiner is respectfully requested to withdraw this rejection.

With respect to claim 15, Applicants respectfully assert that Takeyama fails to disclose, or even suggest, “the integrally formed end of the slope [being] integral with the battery holding concave portion of the internal housing at an area defined by the card insertion port.” The Examiner is reminded that claim 15 depends from claim 1, and claim 1 recites “said card insertion port comprising a slope to guide the insertion of a card into said internal housing,” and that “one end of the slope has an edge for abutting the card in a predetermined position.”

Instead, Takeyama shows the opposite structure. That is, the “upwardly directed hook 21 of the latch arm 20” (the alleged “edge” of Takeyama) is located at the insertion point of the card, while other end of the latch arm 20, (the alleged integral end of Takeyama) extends into the

alleged housing. (See FIG. 8). As such, Takeyama cannot teach the combination of elements recited in claim 15.

With respect to claim 18, Applicants respectfully assert that Takeyama fails to disclose, or even suggest, **“the card abutting edge end of the slope [being] located down the slope from the integrally formed end.”**

Instead, as described above with respect to claim 15, Takeyama shows the opposite structure. That is, the “upwardly directed hook 21 of the latch arm 20” (the alleged “edge” of Takeyama) is located at the insertion point of the card, while other end of the latch arm 20, (the alleged integral end of Takeyama) extends into the alleged housing. (See FIG. 8). Thus, the “upwardly directed hook 21” is **located up the slope** from the other end of the latch arm 20.

For at least this reason, Applicants respectfully assert that claim 18 overcomes the cited art of record.

With respect to independent claim 14, Applicants respectfully assert that Takeyama fails to disclose, or even suggest, at least that “the slope part does not support the card in the predetermined position.”


#### **IV. Conclusion**

In view of the above, reconsideration and allowance of this Application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

This Application is being filed via the USPTO Electronic Filing System (EFS).

Applicants herewith petition the Director of the USPTO to extend the time for reply to the above-identified Office Action for an appropriate length of time if necessary. Any fee due under 37 U.S.C. § 1.17(a) is being paid via the USPTO Electronic Filing System (EFS). The USPTO is also directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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**23373**

CUSTOMER NUMBER

Date: April 30, 2008